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4 Plaintiff, pro se
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8 **UNITED STATES DISTRICT COURT FOR THE**
9 **WESTERN DISTRICT OF WASHINGTON**

10
11 Andrew G. Watters,
12 Plaintiff,
13 v.
14 Mahsa Parviz,
15 Defendant,
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Case no. 2:23-cv-00755-RSL
VERIFIED FIRST AMENDED COMPLAINT
1. EXTORTION
2. FRAUD
3. FALSE PERSONATION
4. UNFAIR COMPETITION
5. DECLARATORY RELIEF
6. VEXATIOUS LITIGANT
DETERMINATION
7. COMPUTER FRAUD
18 U.S.C. sec. 1030(a)(7)
18 U.S.C. sec. 1030(a)(4)

INTRODUCTION

1. The purpose of this action is to rectify the bilking and harassment of a hard-working professional by a serial felon and impostor who suffers from mental health issues and will not stop contacting him from prison. At present, it is now two years after the parties' brief relationship in April/May 2021, and a year and a half after her latest felony convictions following a Federal jury trial in December 2021 (she is currently imprisoned in SeaTac Federal Detention Center).

2. The latest development in this now two year-long saga is that Defendant is threatening to file a frivolous Domestic Violence action in Plaintiff's local court system, specifically to trash his reputation among the judges by airing the parties' "dirty laundry," unless Plaintiff takes down his personal web page about Defendant.¹ The web page is *100% true* and *100% fair* to Defendant, who really said and did all of the things stated, such as claiming to be an accomplished medical researcher who held dual M.D. and Ph.D. degrees from Harvard when that is not the case.² The web page is to protect the public from Defendant's diabolical, illegal schemes. In any event, Defendant is a vexatious litigant under State and Federal law, and Plaintiff seeks that determination in addition to the other requested relief.

1 <https://www.andrewwatters.com/hall-of-shame/mahsa-parviz/>

2 Defendant never attended Harvard Medical School, nor did she earn any degrees from Harvard, nor did she ever obtain a medical license. Despite this, she still signs her letters from prison as "Dr. Parviz." Plaintiff discovered this aspect of the fraud in February 2022.

PARTIES

3. Plaintiff Andrew G. Watters is a resident of California and a licensed attorney, with 17 years in practice and 29 trials (license number #237990 in California and the U.S. District Court for the Northern District of California, admitted November 2005). He graduated from the University of California College of Law San Francisco (formerly U.C. Hastings College of the law) in 2005, and UCLA in 2002.

4. Defendant Mahsa Parviz is a prisoner currently located in Washington. She graduated high school and attended a junior college in Texas, purportedly followed by the University of Texas, followed by Harvard Extension. It is unclear whether she ever graduated from the University of Texas. In any case, she did not graduate from Harvard, Harvard Medical School, or any other prestigious institutions. She falsely claims that she has a M.D. and Ph.D. from Harvard and holds herself out as "Dr. Parviz" in substantially all written correspondence. According to her own attorney's psychiatric evaluation, she suffers from Borderline Personality Disorder and Bipolar Disorder. She is currently serving a sentence of 61 months under convictions for Passport Fraud and Aggravated Identity Theft in the Central District of California with a release date in early 2026.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction based on a Federal Question pursuant to 18 U.S.C. sec. 1030(g), which permits civil actions for damages and injunctive relief against persons committing fraud with computers, as discussed in the new seventh cause of action. Secondarily, the Court has jurisdiction

1 predicated on Diversity of Citizenship, in that there are various
2 state law claims asserted under California law, and the amount
3 in controversy exceeds \$75,000 after accounting for (1) special
4 damages, (2) general damages, and (4) punitive damages.

5 6. Venue is proper in this District because Defendant
6 resides here.

GENERAL ALLEGATIONS³

8 7. Let's start at the beginning, which was April 2021.
9 I had posted a profile on a major online dating website. I
10 found Mahsa in a search for tall, attractive, athletic women
11 under 35 with graduate degrees (lol). Yeah, she was seriously
12 attractive-- a 5'9 dark-haired Persian statue, basically.
13 Unfortunately I deleted all those photos when it became clear
14 that she was a beautiful psycho. Anyway, we met in April 2021
15 (she was 45 minutes late for our first date, and I nearly left).
16 We hit it off great and were talking about how great we were
17 for each other. Everything seemed great for 24 hours, but then
18 I Googled her. In addition to her Harvard persona, a mug shot
19 apparently from one of her cases came up, and I was confused.
20 Wait a second...did I just...you know...with a multiple felon who
21 was pretending to be someone else? Oh my freaking god.

22 "Every nerve ending, all of my senses, the blood in my
23 veins, everything I had was screaming, 'Take off, man, just bam,
get the fuck outta there!' Panic hit me like a bucket of water.
24 First there was the shock of it--BAM, right in the face! Then
I'm just standing there drenched in panic."

--Mr. Orange, Reservoir Dogs (1992)

26 8. But wait...was this really the same person? That's

28 3 Written in the first person for full effect.

1 where it got confusing. She had talked about wanting to complete
2 the Law Office Study Program offered by the State Bar of
3 California in order to...become a lawyer. A lawyer who pled
4 guilty to attempted kidnapping, evading the police, apparently
5 forging a judge's signature, and other felonies? Impossible that
6 this was the same person.

7 9. It turned out to be the same person. Mahsa Parviz, at
8 that point a seven-time convicted felon, actually asked me to
9 study law in my office so she could become a lawyer. I told her
10 that if those things were true, then she had zero chance of ever
11 becoming a lawyer with that record, and it was a complete waste
12 of effort that I was not willing to undertake. I asked her to
13 explain her possible multiple felonies, and she initially said
14 those had all been dismissed. But that's not what the dockets
15 showed-- the dockets showed that her appeals had been dismissed
16 as part of her guilty pleas. What the hell was going on? I
17 explained this to her and she steadfastly denied ever being
18 convicted of these seven felonies. Was I supposed to believe
19 or not believe her without independent proof? I have no idea.
20 Obviously, now I know the truth, but at the time it wasn't clear.
21 By the way, she said she was not married (also a lie-- she was
22 briefly married to the father of her child and apparently still
23 is because her nullity petition in L.A. County was dismissed for
24 lack of prosecution).

25 10. Let me be clear on another thing: I never was hired as
26 Mahsa's attorney, nor did I ever appear for her in any case or
27 file papers for her. I did help out with a couple legal issues
28 as best I could while dating her, which is perfectly legal. At no

1 point in this account do I reveal anything confidential, which
2 in any case would be covered by the crime/fraud exception, in
3 that Mahsa was committing crimes, was a fugitive from justice on
4 a Texas warrant, and was otherwise scamming me into helping her
5 get her daughter back (her parental rights had been terminated
6 in Texas). She was obsessed with this crusade to the point of
7 extorting me into providing legal help by threatening to end
8 the relationship if I didn't comply. Of course it seemed less
9 sick at the time when I was blinded by the possibility of having
10 finally met someone great for me after a long drought.

11 11. This email that I sent to the Harvard IT department in
12 February 2022 sums it up well:

13 Dear Mr. Dash,

14 You're listed as the Administrative Contact in the harvard.
15 edu domain name record, and you seem to be the appropriate
16 recipient for this inquiry.

17 I am a lawyer in California. I have been following the case
18 of USA v. Parviz, which is a Federal criminal case in Los
19 Angeles, CA against Mahsa Parviz. Ms. Parviz was recently
20 convicted of filing a false passport application and
21 aggravated identity theft in connection with an attempt to
22 abduct her estranged biological daughter from foster care.

23 Ms. Parviz and I were in a personal romantic relationship
24 in Spring 2021. When I learned that she was (at that time)
25 a seven-time felon, was suffering from poorly treated or
26 untreated mental illness, and was a compulsive liar, I
ended the relationship. What I didn't know until yesterday
2/2/2022 was that she never attended Harvard Medical School
and never earned a M.D. or Ph.D. there, contrary to her
continuous representations-- at least as of October 2021,
she continued to sign her emails with both of her non-
existent degrees.

27 At the beginning of the relationship, I tried to do my
28 due diligence by Googling her, and my search produced the
following legitimate-looking Harvard web pages:

<https://scholar.harvard.edu/mparviz>

<https://collaborate.med.harvard.edu/display/~MP284/>

1 Parviz%2C+Mahsa

2 She also had a valid Harvard email address that she used to
3 accept email-- which is still valid as of today, as verified
4 by connecting to the Harvard email server via Telnet:
5 mparviz@fas.harvard.edu

6 Finally, Ms. Parviz has several purported publications, and
7 even courses she supposedly taught, listed on her Harvard
8 web pages. The collection of Harvard web pages and related
9 materials made me believe that she had the degrees she
10 represented, and I didn't feel the need to look further.
11 The fake Harvard persona tipped the balance between dating
12 her and not dating her, as well as believing her or not
13 believing her, as I'm sure it has for other guys as well.

14 It turns out that Ms. Parviz was enrolled in Harvard
15 Extension School for a time, according to records filed in
16 a lawsuit in 2017 when Ms. Parviz sued Harvard to release
17 her non-existent Harvard Medical School transcripts. Please
18 see attachment, which is the declaration of the H.E.S. Dean
19 explaining the circumstances, and attaching Ms. Parviz's
20 application for Harvard Extension School that clearly shows
21 Ms. Parviz's situation. I have no idea why Ms. Parviz would
22 sue Harvard knowing that she never attended Harvard Medical
23 School and could not possibly have any transcripts there,
24 but perhaps that is due to some type of mental condition.

25 Anyway, Ms. Parviz appears to have hacked or at least
26 misused her Harvard Extension credentials to create a fake
27 identity on the Harvard website and make people think that
28 she was an accomplished medical researcher and graduate of
29 Harvard. Her Harvard web pages readily appear on Google
30 when people search for her name, although her criminal cases
31 have taken precedence at this point.

32 I am counting myself lucky to have not (so far) had
33 permanent fallout from this toxic relationship, other than
34 a continuous stream of harassing and inappropriate emails,
35 letters, and texts. But I would like to ask Harvard to at
36 least consider deleting Ms. Parviz's web pages and disabling
37 her email address for violations of the Harvard acceptable
38 use policy so that her substantial fraud does not continue.
39 The imprimatur of Harvard is a big deal and is worth
40 protecting from frauds and cheats.

41 I'm cc'ing the prosecutors in Ms. Parviz's case because I
42 think Ms. Parviz's fraudulent Harvard persona is relevant to
43 her sentencing, which is coming up in March 2022. She's at
44 least rational enough to know that impersonating a Harvard
45 M.D./Ph.D. is wrong, and I hope that this awareness and her
46 bad behavior factor into her sentencing in some fashion.

47 Best,

48 Andrew Watters

1 12. So...you be the judge. Was I reasonable in believing
2 her when she steadfastly, repeatedly, and consistently claimed
3 to have Harvard degrees that appeared confirmed by her official-
4 looking Harvard web pages? I don't know. She had photos and other
5 evidence showing that she worked at the hospital at Harvard in
6 some capacity, and lots of credible-sounding stories. But let's
7 continue with the story.

8 13. Colorful highlights of this awful experience include,
9 but are not limited to:

10 14. She once asked me to reload a prepaid American Express
11 card for her while she waited in the car, and it's still unclear
12 to me whether the hundred dollar bills she handed me were
13 authentic or counterfeit. I had this thought and realized the
14 risk while the 7-11 clerk was counting out the bills and then
15 hesitated (while looking at me a little funny) before handing
16 them back to me when Mahsa's AMEX prepaid card was declined to
17 be reloaded. I shrugged, then I bought a few small items in the
18 store and acted as normal as I could while the clerk was staring
19 at me. I was absolutely sweating bullets as I walked out of that
20 store because I knew that I would be the one to get in trouble
21 for handing the clerk an envelope of possibly fake bills without
22 actually looking at the bills first...yeah, what a dummy for
23 trusting her. Thank god the card was declined, which on a reload
24 could only mean one thing...Mahsa was on the run (turns out she
25 had an active warrant in Texas). In all fairness, I did glance
26 at the bills after the reload failed, and I didn't see anything
27 suspicious, which is why the relationship continued. But my
28 point is that this is how easily I could have been arrested and

1 possibly lose my law license because of Mahsa manipulating me.
2 Wow, she is truly diabolical and has absolutely no regard for
3 other people.

4 15. She was legally homeless (she claimed to be
5 searching for a place after recently moving back to the area
6 from Texas) and bounced around from hotel to hotel depending on
7 whichever hotel would let her stay there with a prepaid card.
8 Her parents gave her a lot of money, which is how she supported
9 herself while being unable to work a normal job.

10 16. She was charged with grand theft in state court
11 for allegedly stealing a guy's jewelry and Adderall. The case has
12 languished in Santa Clara County, presumably due to her Federal
13 charges and conviction.

14 17. I witnessed her commit at least one petty theft
15 when she deliberately entered a gym without paying after she told
16 me her membership had expired, and then abused their generosity
17 by using the entire facility for hours, even after they closed
18 and I was waiting for her in the parking lot for about 45
19 minutes.

20 18. Don't get me wrong-- there were some positive things
21 in the relationship after she assured me she was not a seven-
22 time felon and also swore that to the extent she had legal
23 problems, it's because she was framed by her former brother-in-
24 law, a lawyer in Texas. I thought that maybe this was my destiny:
25 a beautiful, superintelligent young woman who was a possibly
26 reformed criminal but who adored me, and that this was my chance
27 to finally have someone in my life. What could I do?

28 19. Okay, so fast forward to early June 2021. After yet

1 another argument where she threatened to dump me if I didn't help
2 get her daughter back, and another series of erratic, bizarre
3 SnapChat audio messages at 3 a.m., I decided that I had had
4 enough. I dumped her and sent her a Dear Jane email. I blocked
5 her on SnapChat, phone, and email, and promised myself that I
6 would never make the same mistakes again.

7 20. After about five weeks of not hearing from her, I felt
8 a sense of relief, but also a sense of curiosity. Why hadn't
9 I heard from her when she had been so vocal in her desire to
10 rekindle the relationship? I googled her again and was shocked
11 to see USA v. Parviz, the Federal criminal case regarding the
12 false passport application. I confirmed that she was in custody
13 using the Federal inmate locator, and that answered my question.
14 Part of me felt bad for her and the other part of me felt glad
15 that she was behind bars. So I felt conflicted...and keep in
16 mind, at this point I still thought she was an accomplished
17 medical researcher with M.D. and Ph.D. degrees from Harvard. So
18 what did I do? I wrote her a letter stating how I felt, as well
19 as my concerns about her competency to stand trial in a Federal
20 criminal case. Whoops...this appears to have prompted the ongoing
21 campaign of harassment I have experienced.

22 21. First, she started writing me letters-- about twenty
23 pages of letters, many of which talked about the future in
24 an endearing fashion. Then she started calling, texting, and
25 emailing. I was still developing the situation, so I didn't
26 know what to do. I didn't want to talk to her on jail calls,
27 and I didn't want to get texts from her. So I let her send
28 emails. Honestly it was an engaging correspondence for about a

1 month and a half until I finally blocked her after yet another
2 inappropriate series of messages. I can't recall exactly what she
3 said, but it was something about being taken care of financially
4 by someone else who she was talking to. I thought, wait a
5 second-- you send me letters talking about a future with me and
6 then you threaten to pick someone from a purportedly deep pool of
7 suitors? Sick, which is how she thinks.

8 22. So yeah, by then I had met my now-wife and the rest
9 is history. But I still keep getting calls, texts, and emails
10 from Mahsa and/or her mom. The last straw was yet another time-
11 wasting request where Mahsa asked me to send her "file" to her
12 attorney, who her mom confirmed was the longtime family attorney.
13 The problem is, when I reached out to confirm the request with
14 the attorney, he said he didn't represent Mahsa-- and he didn't
15 respond to my subsequent email asking if he still wanted anything
16 I had gathered while helping out Mahsa with her legal problems.
17 I then blocked Mahsa's latest phone number (somehow she keeps
18 sending texts from jail), complained to the Bureau of Prisons,
19 and made it clear that if I get a single additional communication
20 from Mahsa, I will finally get that restraining order I talked
21 about previously. I am not sure what that would accomplish
22 considering that Mahsa is already in jail, but it would be a
23 symbolic gesture at least. I am finally taking this complaint
24 online because I have nothing else I can do at this point to stop
25 her harassing communications for good.

26 23. What did I learn from all this? Well, some people are
27 just so screwed up that they can't help but commit felonies.
28 Mahsa appears to be one of those people. In retrospect, I just

1 have to recognize that I am the victim of a scam and go from
2 there. At least I don't appear to have any lasting effects from
3 this toxic relationship, other than emotional trauma from the
4 roller coaster I experienced. I am eternally thankful that I
5 was able to resist the temptation of someone so wrong but so
6 attractive, in order to meet someone so right (and just as
7 attractive), who I am with now.

8 24. If further proof is needed, just check out the summary
9 of the trial evidence from the government that's in their
10 opposition to Mahsa's motion for acquittal. Sad. The motion for
11 acquittal was obviously denied. And she hasn't even tried to
12 appeal her conviction!

13 25. I have way more things to share, but I will start by
14 adding more supporting documents as I find the time so that this
15 is finished once and for all and is unassailable proof that this
16 walking disaster of a person needs to disappear for the length
17 of her sentence, which I estimate at five years given her lengthy
18 and serious criminal history.

19 26. Update March 14, 2022 - the Harvard information
20 security department is looking at the web pages and they sent a
21 polite email back.

22 27. Update March 19, 2022 - Harvard deleted her fake web
23 page.

24 28. Update March 21, 2022 - I've heard from a couple other
25 victims, as well as one person who wants to post counterpoint-
26 type mitigating factors on here. After much consideration, I've
27 decided that I'm going to host a counterpoint/mitigation section
28 below with comments and supporting documents from persons who

1 want to defend Mahsa in some fashion-- as long as they take
2 responsibility for whatever they post on here with their names
3 and contact information. It's only fair to permit that since I
4 have a megaphone here while Mahsa is in prison and can't respond.

5 29. Update April 4, 2022 - I had a very interesting
6 conversation with another victim who says Mahsa tried to take him
7 for a million dollars. Wow.

8 30. Update June 19, 2022 - Mahsa's sentencing will be in
9 July 2022. Meanwhile, she followed through on her extortionate
10 threat to report me to the State Bar if I didn't remove my web
11 page. I received a letter of inquiry, to which I responded within
12 20 minutes. I have nothing to hide and I categorically deny
13 doing anything improper. As a thank-you for her extorting me, I
14 am going to post an email I received from one of her Boston-area
15 friends, who says he sent the following email to Mahsa's family
16 in an effort to conduct an intervention. Here it is, verbatim:

17 Dear Mr. Parviz,

18 My name is Andrew Taylor; I have been a friend of your
19 daughter Mahsa for a few months now. Mahsa is an
20 intelligent, hard-working, lovely young woman in whom I see
21 tremendous potential. However, as I'm sure you're aware,
22 she has led a lifestyle here in Boston that is causing me
and the rest of her friends great concern. We wish to
intervene and help her make better decisions but we don't
quite know where to start; I am writing today to solicit
your input. Among her concerning behaviors:

23 -Compulsive drinking. Mahsa, despite being legally
24 underage, consumes significant amounts of alcohol on a daily
basis, despite having endured an alcohol-induced miscarriage
during her relationship with Mark as well as having been
arrested for DUI. Her alcohol consumption has reached the
point that we cannot take her to a restaurant that serves
alcohol without her ordering several drinks, regardless of
her ability to afford them or any events on her agenda that
would require her to present a polished image; there have
been several instances where Mahsa's alcohol consumption
has resulted in her missing job interviews and classes at

1 Harvard. I have personally witnessed her using her sister's
2 driver's license numerous times as a means to enter liquor
stores and drinking establishments.

3 -Compulsive shopping and financial irresponsibility. Mahsa
4 owns numerous clothing articles from very reputable name
5 brands (Gucci, Prada, etc.) and continues to buy many more,
6 yet she has no clear means of affording them. Visits to her
7 apartment have resulted in her friends, myself included,
8 finding notices from Neiman Marcus, Macy's and Walmart,
9 demanding immediate payment for significantly large credit
10 balances Mahsa owes them; Mahsa recently disclosed to her
11 boyfriend [redacted] that her credit score is only slightly
12 higher than 500, which doesn't qualify her for a loan of any
13 sort. To illustrate her lack of financial responsibility,
14 this semester, she complained to her boyfriend, [redacted],
15 that she was unable to afford her tuition for the semester.
16 [redacted] immediately suggested that she return some of
17 her very expensive clothing items, in response to which she
18 threatened to divorce him if he ever suggested such an idea
19 if they were to get married. Further, she has bragged to
20 several of her friends, myself included, that nothing gets
21 her parents to send money to fuel her shopping habits more
22 quickly than the phrase "Mommy, I'm hungry!".

23 -Poor language. Mahsa doesn't hesitate to use obscenities
24 when addressing her friends, especially if she is upset.
25 I recently inquired with her about why her Facebook and
26 LinkedIn profiles suggest she is a PhD candidate at Harvard,
27 when I know first-hand that she is attempting to get into
28 the ALM (Master of Liberal Arts) program in finance at
Harvard. Her response was the following:

29 "Hey fat fuck! Yeah I'm getting my masters and my phd. Go
30 stick it up your butt buddy [redacted]'s ass and don't speak
31 to me again. I don't talk to your kind loser. :)...you have
32 no friends you depressed fucking loser"

33 I wish I could tell you that outbursts like these are rare
34 but unfortunately, they are quite common. Mahsa routinely
35 talks like this to anyone here in Boston who has the nerve
36 to refuse her demands, most commonly for alcohol and money,
37 or when the truth in her statements comes under question.

38 -Sexual promiscuity. Mahsa has disclosed to [redacted] that
39 she has had numerous sexual partners, many of whom with
40 which she has had unprotected sex. She has had numerous
41 relationships, all of which have been terminated as a result
42 of her being sexually unfaithful to her partner; her most
43 recent relationship with [redacted] ended as when she came
44 to Dallas for a wedding, she had sex with a surgeon she met
45 at the wedding. Mahsa received a birth control shot shortly
46 after she moved to Boston, presumably with money provided
47 by you, and has used this as an excuse to have unprotected
48 sex with men she typically has known for less than a couple

1 of weeks. We are worried that when the shot's potency
2 inevitably wears off, her sexual habits will continue which,
3 combined with her egregious alcohol consumption, will result
4 in Mahsa enduring a second miscarriage.

5 Mr. Parviz, I'm not writing to you today with the intention
6 of ratting her out, I'm writing because I and all of
7 my mutual friends with her know that this pattern of
irresponsibility will result in imminent consequences for
her. We wish to intervene before it is too late but she
has resisted our efforts and continues to habitually make
poor decisions. Any sort of encouragement or advice you can
provide to me would be greatly appreciated.

8 With warmest regards,
9 Andrew Taylor

10 31. Update July 2, 2022 - Mahsa's State Bar complaint was
11 dismissed, as expected. Meanwhile, the Government filed a pre-
12 sentencing report recommending a sentence of 81 months (6 years
13 9 months) in prison due to Mahsa's extensive criminal history
14 and flagrant disregard for the law. I was disappointed to see
15 the Harvard angle omitted from the report, but I guess they
16 had enough ammunition without it. According to Mahsa's defense
17 counsel's own psychiatric evaluation of her, she has Borderline
18 Personality Disorder and Bipolar Disorder. I am not surprised in
19 the least by that, nor am I surprised by her trying to get out
20 of a stiff sentence by claiming that her mental health problems
21 caused her to offend. Mahsa deserves to go to prison for a
22 long time, and her sentencing is on July 12, 2022. Will update
23 this with additional documents in the near future, including
24 my restraining order filing that I've finally gotten around to
25 completing.

26 32. Update July 3, 2022 - I heard from [redacted], who
27 left me a voicemail stating that he cannot be associated with
28 Mahsa in any way. I debated for a while before redacting his name

1 from Mr. Taylor's email. On the one hand, redacting information
2 is inconsistent with my policy of radical honesty. However, Mr.
3 Taylor vouched for [redacted] and said he knew [redacted] is a
4 good guy. That was enough for me, setting aside privacy concerns.
5 So there you have it, I balanced privacy and radical honesty
6 appropriately in a difficult case. Also, by request, here is
7 the Government's pre-sentencing report, and Mahsa's response. I
8 laughed out loud at her response, especially in the "acceptance
9 of responsibility" section.

33. Update July 14, 2022 - Mahsa has been sentenced to
61 months in prison (five years, one month) followed by three
years of supervised release during which she has to obtain mental
health treatment. I am also ready to pull the trigger on the
restraining order, I just need to sign the forms. I guess that's
a wrap for now.

16 34. In May 2023, I received another letter from Defendant,
17 which is attached as **Exhibit A**, following my express directive
18 for no contact. In it, Defendant threatens to file what would
19 be a frivolous Domestic Violence action against me in San Mateo
20 County, where I practice, specifically to trash my reputation
21 among the local judiciary-- unless I take down my web page about
22 her. This was the last straw, and this action followed.

FIRST CAUSE OF ACTION

EXTORTION

25 35. Through the foregoing course of conduct, Defendant
26 violated California state law prohibiting extortion, specifically
27 Cal. Penal Code sec. 518(a) in threatening to defame, slander,
28 and/or reveal private information about Plaintiff unless he gave

1 in to her demand to take down his web page about her.

2 36. Wherefore, Plaintiff prays for special damages, general
3 damages, and punitive damages.

4 **SECOND CAUSE OF ACTION**

5 **FRAUD**

6 37. Through the foregoing course of conduct, Defendant
7 obtained at least \$10,000.00 from Plaintiff in addition to
8 substantial emotional distress suffered by Plaintiff. This
9 included Plaintiff believing Defendant's false c.v., which is
10 attached as **Exhibit B**, until discovering the true facts in 2022.

11 38. Wherefore, Plaintiff prays for special damages, general
12 damages, and punitive damages.

13 **THIRD CAUSE OF ACTION**

14 **FALSE PERSONATION**

15 39. Through the foregoing course of conduct, Defendant
16 violated California state law prohibiting false personation,
17 specifically Cal. Penal Code sec. 529, through her impersonation
18 of an accomplished medical researcher claiming non-existent
19 degrees. Plaintiff only discovered this aspect of the fraudulent
20 scheme in February 2022.

21 40. Wherefore, Plaintiff prays for special damages, general
22 damages, and punitive damages.

23 **FOURTH CAUSE OF ACTION**

24 **UNFAIR COMPETITION**

25 41. Through the foregoing course of conduct, Defendant
26 violated Federal law against wire fraud, in that she sent her
27 false c.v. from her Harvard email address, which was interstate.
28 In addition, Defendant violated various criminal statutes in

1 California. California state law prohibits unfair competition,
2 which is covered by Business and Professions Code sec. 17200
3 and is predicated on Defendant's violations of various criminal
4 statutes.

5 42. Wherefore, Plaintiff prays for restitution in an amount
6 according to proof.

7 **FIFTH CAUSE OF ACTION**

8 **DECLARATORY RELIEF**

9 43. Through the foregoing course of conduct, as well as
10 Defendant's false claims made to the State Bar of California,
11 there is a dispute between Plaintiff and Defendant concerning
12 their rights and duties.

13 44. Wherefore, Plaintiff seeks a decree that there was
14 never any contract between Plaintiff and Defendant for the
15 provision of legal services, and no attorney-client relationship.

16 **SIXTH CAUSE OF ACTION**

17 **VEXATIOUS LITIGANT DETERMINATION**

18 45. Through the foregoing course of conduct, Defendant
19 violated California state law prohibiting vexatious litigation
20 under CCP sec. 391.

21 46. This includes (1) Defendant's attempt to re-litigate
22 the loss of her parental rights in Texas, after which she forged
23 a judge's signature on a court order and then filed the forged
24 order in a new, frivolous Domestic Violence case in Orange
25 County, California-- all in an attempt to regain custody of her
26 daughter using abusive and unauthorized legal process. This
27 was an attempt to re-litigate the parental rights termination
28 in another state after a final determination against her by

1 the highest court of her own state, in violation of Cal. Code
2 of Civil Procedure sec. 391(b)(2); and other matters yet to be
3 discovered by Plaintiff. A single violation of 391(b)(2) is
4 sufficient for a vexatious litigant determination.

5 47. This Court is empowered to make a finding of vexatious
6 litigation pursuant to the All Writs Act, 28 U.S.C. sec. 1651,
7 and enter a pre-filing order.

8 48. Wherefore, Plaintiff prays for a pre-filing order
9 enjoining Defendant from filing vexatious litigations in any
10 court, including this Court and California state courts.

11 **SEVENTH CAUSE OF ACTION**

12 **COMPUTER FRAUD**

13 **Count One**

14 **18 U.S.C. sec. 1030(a)(7)**

15 49. Through the foregoing course of conduct, Defendant
16 violated 18 U.S.C. sec. 1030(a)(7) prohibiting extortion as a
17 means of interfering with the integrity of information available
18 on a protected computer.

19 50. To wit, Defendant attempted to extort Plaintiff into
20 removing his web page about Defendant, which is served from a
21 computer used extensively in interstate commerce,⁴ and which
22 would be a thing of value, in violation of 18 U.S.C. sec.

23 _____
24 4 Plaintiff's primary server containing the web page is
25 physically located in his office in California, and is located on
26 the Internet at IPv4 address 38.122.223.130. Plaintiff's primary
27 server is used to serve multiple websites worldwide via the
28 Cogent fiber network that connects to the Internet, while also
running Plaintiff's email system. Plaintiff's email system is
also used for worldwide email transmission and receipt. Server
logs demonstrate substantial interstate use of Plaintiff's server
by visitors outside California, including Texas where Defendant
is originally from.

1 1030(a)(7)(A)-(C) prohibiting threatening damage to a protected
2 computer; and additionally, Defendant sought restoration of her
3 fake Harvard web pages by threatening Plaintiff via extortionate
4 means. This occurred in May 2023, shortly before this action was
5 filed, and the action is therefore timely.

6 51. Wherefore, Plaintiff prays for special damages and
7 permanent injunctive relief prohibiting future violations of the
8 computer fraud law, pursuant to 18 U.S.C. sec. 1030(g).

9 **Count Two**

10 **18 U.S.C. sec. 1030(a)(4)**

11 52. Through the foregoing course of conduct, Defendant
12 violated 18 U.S.C. sec. 1030(a)(4) by hacking and/or exceeding
13 the authorized use of Harvard web servers in order to create her
14 fake Harvard web pages, and thereby defrauded Plaintiff out of at
15 least \$10,000.00. The loss occurred in May 2021, but the damage
16 was only discovered in February 2022 when Plaintiff discovered
17 that the Harvard web pages were fake and had been created through
18 the indicated computer tampering. In addition, February 2022 is
19 when Plaintiff discovered that Defendant's extensive c.v. sent
20 to Plaintiff via interstate wire was a complete fabrication. As
21 such, this action is timely under 18 U.S.C. sec. 1030(g)

22 53. Wherefore, Plaintiff prays for special damages and
23 permanent injunctive relief prohibiting future violations of the
24 computer fraud law, pursuant to 18 U.S.C. sec. 1030(g).

25 **PRAYER**

26 1. Special damages according to proof and not less than
27 \$75,001.00

28 2. General damages according to proof.

1 3. Punitive damages according to proof.
2 4. Attorney fees to the extent permitted by law.
3 5. Pre-filing permanent injunction against Defendant.
4 6. Computer fraud injunction prohibiting the threatened
5 violations of the computer fraud law and enjoining Defendant
6 from restoring her fake Harvard web pages, whether at Harvard or
7 elsewhere on the Internet.

8 7. Such other and further relief as is just and warranted.

9
10 Date: May 25, 2023

Andrew G. Watters

Andrew G. Watters

12 **VERIFICATION**

13 I have read the foregoing complaint and certify that the
14 facts stated therein are true.

15 I declare under penalty of perjury under the laws of the
16 State of California that the foregoing is true and correct.

17
18 Date: May 25, 2023

Andrew G. Watters

Andrew G. Watters

Exhibit A

May 7th, 2023

Hi Andrew,

I hope all is well w/ you. I'm writing regarding your lawfirm webpage. I was able to get all the content you posted about me last year removed on search engines but I was recently informed they're popping back up so I wanted to just reach out to you to have you remove all content about me & my family (the alternative is me filing a DVRO in Redwood City & even though you've done a lot of damage, I'd rather not let all the judges you practice in front of know our dirty laundry & that we met on SA... plus I have to go to Travis County, TX next month b/c Roger is testifying at the TDI trial & it would be better if they didn't decide to subpoena you. Too, based on bad blood made public on your site.

My Harvard Scholar page isn't fraudulent.. please get it back online. I have co-authors on all of my research & everything is available on hollis.harvard.edu, dash.harvard.edu, [nih.pubmed.gov](https://pubmed.ncbi.nlm.nih.gov) as well as the journal webpage or American Academy of Neurology (I'm an elected member since 2013). You said some disturbingly sexist things, Andrew. I'm not comfortable w/ anyone knowing about my intimate affairs (that should stay private between two people & we had a deal at the beginning of the arrangement).

Please write me back asap when the pages are deleted or if you prefer to contact my attorney, Tommy, you can email him at Thomas@bundy-law.com.

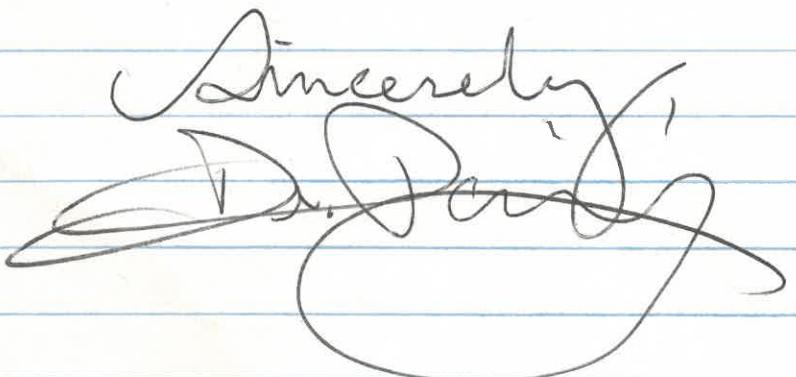
Sincerely,


Exhibit B



Dr. Mahsa Parviz

info@parvizmed.org | (657) 210-0021 | 107 Avenue Louis Pasteur Box 252, Boston, MA 02115
eRA COMMONS USER NAME: mparviz1 | [Google Scholar Publications](#) | [Academic Profile](#)

EDUCATION

- **Post-Graduate Certificate, Applied Biostatistics**

Harvard Medical School Clinical and Translational Science Center – Boston, MA (2015 – 2016)

- Program director: Brian Healy, PhD

- **M.D./Ph.D., Neurobiology Candidate**

Harvard Medical School/Graduate School of Arts and Sciences – Boston, MA (2008 – 2015)

- Dissertation title: "Disorders of GABA metabolism: SSADH and GABA-transaminase deficiencies."
- 2013 and 2014 Harvard Medical School Innovation Fellows Program Scholar (award accepted 2013-2014 and 2014-2015, declined 2015-2016).
- Research Sub-Award Recipient for MD/PhD program, Harvard Clinical and Translational Science Center (NIH grant number 1 UL1 RR025758).

- **B.S., Global Business, minor in Neuroscience**

University of Texas at Dallas – Richardson, TX (2011)

- 2007 State of Texas Highest Ranking Graduate Scholarship, Texas Education Agency

- **Honors High School Diploma**

Willow Bend Academy – Plano, TX (2007)

- Class of 2007 Valedictorian

RESEARCH & CLINICAL EXPERIENCE

- **Instructor – Department of Surgery**

Harvard Medical School (2015 - 2017)

- Seminars and lectures in General Surgery, Genetics, Neurology, Internal Medicine, and Pediatrics.

- **Research Director – Department of Surgery**

Harvard Medical School/Brigham and Women's Hospital – [Laboratory for Surgical and Metabolic Research \(2015 - 2016\)](#)

- Hospital and academic appointment by Chief Medical Officer Dr. Stanley G. Ashley.
- Received a generous bequest of the Harvard-based laboratory which formerly belonged to a leading transplant surgery innovator, the late Dr. Francis D. Moore, and continued independent research towards fulfilling residency requirements, collaborated with industry and academic institutions, mentored 4 M.D. fellows in General Surgery and 4 undergraduate students and one medical student over the time span of one year.

- **Clinical Research Scientist**

The Epilepsy and Clinical Neurophysiology Center at Boston Children's Hospital (2014 - 2016)

- Received the merit-based William G. Lennox Scholars in Medicine Award at Harvard Medical School for research of pediatric neurotransmitter disorders under the mentorship of Dr. Phillip L. Pearl, M.D., HMS William G. Lennox Chair and Professor of Neurology and Boston Children's Hospital Director of The Epilepsy and Clinical Neurophysiology Center.
- Brief overview of experience includes patient database oversight, manuscript preparation, textbook chapter editing, observing patients in the Epilepsy Center, identification of mutations in the *ALDH5A1* gene, construction of national posters and research involvement in the development of an NIH-funded phase II clinical trial of SGS-727 therapy in SSADH deficiency (NCT02019667).

- **Research Scientist**

The Tannous Laboratory at Massachusetts General Hospital Department of Neurology (2014 - 2015)

- In vivo and in vitro experimentation of two novel drug therapeutics for glioma stem cell therapy in the MGH Experimental Therapeutics and Molecular Imaging Laboratory under the guidance of Dr. Bakhos Tannous, Ph.D., and Dr. Christian Badr, Ph.D.

- **Visiting Research Scholar**

The Saint-Geniez Laboratory at Schepens Eye Research Institute (2014 - 2015)

- Conducted dry Age-related Macular Degeneration (AMD) research and investigated the phagocytotic pathway of photoreceptor outer segment (POS) and fetal human retinal pigment epithelium.

- **Research Committee Member**

Crimson Care Collaborative – Massachusetts General Hospital Revere Pediatrics (2013)

- Performed data analysis working as a member of the Harvard Medical School student-faculty free clinic.

PROFESSIONAL & RELEVANT EXPERIENCE

- **Founder**

Mahsa Parviz, LC. d/b/a/ Parviz Pharmaceuticals and Health Systems (2014 - Present)

- [Developed clinical research organization in 2014 through funding by Harvard Medical School's Center for Primary Care Innovation Fellows Program](#) (merit-based selection criteria) in conjunction with Brigham and Women's Hospital under the mentorship of HMS professor Dr. Rose M. Kakoza, M.D., M.P.H.

- Incorporated Wyoming-based LLC in 2016 for which I oversee all SOPs, NDAs, compliance, regulatory affairs, legal affairs, outreach efforts and presentations to industry leaders with special emphasis on industry drug development and multidisciplinary health care redesign.
- Recruited and trained team of physicians, medical assistants, nurses, graduate and medical students for an initial pilot phase of the advanced, centralized, multidisciplinary high-risk care management program.
- [U.S. NPI: 1679045041](#) registered for Mahsa Parviz provider specialty in Plastic and Reconstructive Surgery (physician/general surgery) and Research Study (organization); Durable Medical Equipment distribution license # 1001962 active in State of Texas.

- **Founder**

STEPS to Health, Inc. (2013 - Present)

- [Developed academic research organization in 2013 through funding by Harvard Medical School's Center for Primary Care Innovation Fellows Program](#) (merit-based selection criteria) in unison with Boston Children's Hospital under the mentorship of HMS professor Dr. Jennifer K. Cheng, M.D.
- Incorporated in 2015 as a Massachusetts-based non-profit corporation for which I serve as PI/Study director of several parallel clinical trials with oversight of pre-clinical trials.
- Developed validated clinical tools, health coach training curriculum, and co-authored guidebook on implementing our health coaching model for use at universities and hospitals across the nation and worldwide.
- Recruited and trained team of 6 Harvard undergraduates and 3 graduate students for initial pilot phase of health coaching program where at-risk families of obese and over-weight pediatric patients were educated on how to adopt healthy behaviors and the physician health goals were monitored.

- **Co-Founder**

Pharmaceutical Products of America, Corp. (2012 - 2014)

- Incorporated compounding pharmacies and diagnostic facilities in Dallas/Ft. Worth metroplex.

- **Co-Founder**

Zelletek, LLC (2008 - 2013)

- Managed day-to-day operations of the nascent biotechnology company specializing in biosensor development and real-time cell culture assays for toxicity testing in drug development and personalized cancer treatment.
- Established and maintained relations with academic institutions and research corporations such as George Mason University, Stanford University and Plexon Inc.

- **Senior Advisory Board Member & Private Consultant**

UNT Center for Network Neuroscience (2007 - 2018)

- Conducted audits, maintained primary responsibility of research facility for announced/unannounced FDA and USDA audits, and oversaw all matters pertaining to compliance, legal, and regulatory requirements for home laboratory, external clinical trials, and satellite facilities.
- Private consultant for clinical trials and commercialization of drugs and biomedical devices to industry leaders, including Fortune 100 buyers.
- Completed J-Term project from Dec. 2013 – Jan. 2014 conducting independent research and developing continuous glucose monitoring device for use in cell culture and delivered educational presentation on diabetes mellitus and synopsis of specific parameters which were to be improved upon integrating the new continuous glucose monitoring system to Department of Biological Science and research team.

SELECTED PEER-REVIEWED PUBLICATIONS, BOOK CHAPTERS, AND PROFESSIONAL MEMBERSHIPS

- **Parviz M**, Vogel K, Gibson KM, Pearl PL. [Disorders of GABA metabolism: SSADH and GABA-transaminase deficiencies](#). J Pediatr Epilepsy. 2014;3(4):217-227. [Publisher's Version](#)
- **Parviz M**, Kaptain GJ, Vincent DA, Sheehan JP, Laws ER. [Transsphenoidal Approaches for the Extracapsular Resection of Midline Suprasellar and Anterior Cranial Base Lesions: Revision](#). Neurosurgery. 2015;(49):94-101.
- Pearl PL, **Parviz M**, Vogel K, Schreiber J, Theodore WH, Gibson KM. [Inherited disorders of gamma-aminobutyric acid metabolism and advances in ALDH5A1 mutation identification](#). Dev Med Child Neurol. 2015;57(7):611-7.
- Yuskaitis CJ, **Parviz M**, Loui P, Wan CY, Pearl PL. [Neural Mechanisms Underlying Musical Pitch Perception and Clinical Applications Including Developmental Dyslexia](#). Curr Neurol Neurosci Rep. 2015;15(8):574.
- Lapalme-Remis S, Lewis E, De Meulemeester C, Chakraborty P, Gibson KM, Torres CH, Guberman A, Salomons G, Jakobs C, Ali-Ridha A, **Parviz M**, Pearl PL. [Natural history of succinic semialdehyde dehydrogenase deficiency through adulthood](#). Neurology. Aug 12 2015.
- Pearl PL, Koenig MK, Riviello J, Christie M, Bain J, Averill K, Chung WK, Chiriboga CA, Hodgeman R, **Parviz M**, Gibson KM. [Novel Intervention in Gaba-transaminase Deficiency](#). Annals of Neurology. 78:S177-S178 Oct 1 2015.
- Pearl PL, **Parviz M**, Hodgeman R, Gibson KM. [Succinic semialdehyde dehydrogenase deficiency](#). In: Reimischel T (ed.) MedLink Neurology. San Diego, California: MedLink Corporation; Apr 16, 2016.
- Pearl PL, **Parviz M**, Hodgeman R, Gibson KM. [GABA-transaminase deficiency](#). In: Reimischel T (ed.) MedLink Neurology. San Diego, California: MedLink Corporation; May 3, 2015.
- Attri SV, Singhi P, Wiwattanaditkul N, Goswami JN, Sankhyan N, Salomons GS, Roullett J, Hodgeman R, **Parviz M**, Gibson KM, Pearl PL. [Incidence and Geographic Distribution of Succinic Semialdehyde Dehydrogenase \(SSADH\) Deficiency](#). In: JIMD Reports, Volume 34. Berlin, Germany: Springer Nature; Nov 5 2016.
- Pearl PL, **Parviz M**. [Chapter 61: Overview of Seizures and Epilepsy in Children](#). In: Swaiman's Pediatric Neurology: Principles and Practice, 6e. Elsevier Health Sciences. Mar 16 2017.

- Pearl PL, Parviz M. [Chapter 76: Inherited Metabolic Epilepsies](#). In: Swaiman's Pediatric Neurology: Principles and Practice, 6e. Elsevier Health Sciences. Mar 16 2017.
- Parviz M, Parviz M. [From Bench to Bedside: Reducing Novel Therapeutic Platforms to Practice](#). In: Bloom BH (ed.) Medicine and Materials Express. Vol. 1. 1st ed. Boston: Harvard Health Publications; 2011. pp. 735-751. [Publisher's Version](#)
- Parviz M, Parviz M. [From Bench to Bedside: Drug Development Methods in Personalized Medicine](#). In: Bloom BH (ed.) Medicine and Materials Express. Vol. 1. 1st ed. Boston: Harvard Health Publications; 2011. pp. 752-763. [Publisher's Version](#)
- Parviz M, Parviz M. [From Bench to Bedside: Microelectrode Arrays in Personalized Medicine](#). In: Bloom BH (ed.) Medicine and Materials Express. Vol. 1. 1st ed. Boston: Harvard Health Publications; 2011. pp. 764-779. [Publisher's Version](#)
- Parviz M, Parviz M. [From Bench to Bedside: CRISPR and Gene Editing in Personalized Medicine](#). In: Bloom BH (ed.) Medicine and Materials Express. Vol. 1. 1st ed. Boston: Harvard Health Publications; 2011. pp. 780-787. [Publisher's Version](#)
- [Massachusetts Medical Society](#)
- [American Neurological Association](#)
- [American Academy of Neurology](#)
- [MedLink](#)
- [American Heart Association](#)
- [American Society of Cytopathology](#)
- [Harvard Federalist Society](#)

HONORS

2005	Science & Technology Young Achiever, American Collegiate Accreditation Association
2007	State of Texas Highest Ranking Graduate Scholarship, Texas Education Agency
2007	The Gerald D. Cagle Prize for Research and Development, Alcon
2007	Southern Methodist University President's Scholarship (declined)
2007	U Michigan Medical Scholarship (declined)
2007	Baxter Foundation / Stanford Medical School Scholarship (declined)
2008-2012	Research Sub-Award Recipient, Harvard Clinical and Translational Science Center (NIH grant number 1 UL1 RR025758)
2010	Mannick Research Award
2010	Peter Bent Brigham Scholar
2012	Graduate Travel Scholarship for Academic Distinction and Service from FIRE (a non-profit organization of advocates in higher education), Harvard University
2012	Graduate Travel Scholarship for Healthcare Policy Reform from the Leadership Institute, Harvard University
2012-2013	Clare Booth Luce Ladies Scholarship for Leadership, Harvard University
2013	Robert Osteen Teaching Award, Harvard Medical School
2013-2015	Innovation Fellows Program Award, Harvard Medical School (accepted 2013-14 and 2014-15, declined 2015-16)
2013-2018	Research Sub-Award Recipient, Harvard Clinical and Translational Science Center (NIH grant number 1 UL1 TR001102)
2013-2018	Research Sub-Award Recipient, Harvard Medical School and Boston Children's Hospital (NIH/NINDS clinical trial identifier NCT02019667)
2014-2016	The William G. Lennox Scholars in Medicine Award, Harvard Medical School and Boston Children's Hospital
2014	Health Accelerator Challenge Top Ideator, Harvard Medical School and Harvard Business School
2015	Partners in Excellence Award, Brigham and Women's Hospital
2015	Kessler Young Faculty Award, Brigham and Women's Hospital
2015	Simonian-Murray Prize for Research Excellence in Surgery, Brigham and Women's Hospital
2015	Excellence in Teaching Award, Harvard Medical School
2016-2017	Editorial Board Award for Medical Advancement, MedLink Neurology
2016-2018	Expert Reviewer Award for Rare Disease Research, Orphanet

RESEARCH SUPPORT

Ongoing Research Support

Departmental Grant (Restricted); Neurology Boston Children's Hospital Evaluation of Pediatric Neurotransmitter Disorders Role: Co-Investigator	Pearl, Phillip L. (PI)	07/01/14 – 07/01/19
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Completed Research Support

NCT02019667 NIH/NINDS Phase 2 Clinical Trial of SGS-742 Therapy in Succinic Semialdehyde Dehydrogenase Deficiency Role: Co-Investigator and Trial Coordinator	Theodore, William H. (PI)	12/10/13 – 11/30/18
Departmental Grant (Restricted); Biological Sciences University of North Texas Center for Network Neuroscience Role: Co-Investigator	Gross, Guenter W. (PI)	04/01/17 – 05/31/18

1UL1TR001102; 1TL1TR001101; 1KL2TR001100 NIH/NCATS Harvard Clinical and Translational Science Center Role: Co-Investigator	Nadler, Lee M. (PI)	09/26/13 – 04/30/18
Departmental Grant (Unrestricted); Surgery Brigham and Women's Hospital Laboratory for Surgical and Metabolic Research Role: Co-Investigator	Ashley, Stanley W. (PI)	07/01/11 – 06/30/17
1R01DK084064 NIH/NIDDK Surgical Modulation of Intestinal Nutrient Transport Role: Co-Investigator	Tavakkoli, Ali (PI)	09/30/11 – 08/31/16
Innovation Fellows Program Award Harvard Medical School A Pilot Complex Care Management Team for Highly Complex and Chronically Comorbid Diabetic Patients (Restructuring and Ambulatory ICU in a Large Academic Medical Center) Role: Co-Investigator	Kakoza, Rose M. (PI)	10/01/14 – 09/30/15
William G. Lennox Scholars in Medicine Award Harvard Medical School Advancing mutational identification and analyzing disorders of GABA metabolism: SSADH and GABA-transaminase deficiencies Role: PI	Parviz, Mahsa (PI)	07/01/14 – 05/31/15
Young Clinician Award CIMIT/Boston Biomedical Innovation Center (NCI/NHLBI) Development of a Minimally Invasive Endoluminal Therapy for the Metabolic Complications of Obesity Role: Co-Investigator	Sheu, Eric G. (PI)	04/01/14 – 04/01/15
Innovation Fellows Program Award Harvard Medical School Students as Health Coaches in a Team-Based, Patient-Centered Obesity Care Model Role: Co-Investigator	Cheng, Jennifer K. (PI)	10/01/13 – 09/30/14